

**1. Supplemental Request 3.**

For each of the above indexed documents, please provide a soft-copy - in its native electronic file format form – together with all of its original metadata.

**2. Interrogatory 7.**

Please identify each person who has been an officer of the defendant corporation (during the relevant time period) and state as to each:

- a. Name, address, sex, age, and race;
- b. Office held;
- c. Duties and responsibilities of the office;
- d. Inclusive dates in office.

**3. Interrogatory 8.**

As January 1, for each year (during the relevant time period), please state with reference to the persons employed in each facility or location maintained by the defendant corporation:

- a. The total number of employees,
- b. The number of female employees,
- c. The number of employees over 40,
- d. The number of female employees over 40.

**4. Interrogatory 9.**

For each facility maintained by the defendant (during the relevant time period), please identify each department within the facility and state:

- a. The name and title of the person in charge of the department;
- b. The title and a description of each job category within the department, the average salary for the category, and the date the category was established.
- c. The line of progression for job categories within the facility indication the jobs which are prerequisites for higher jobs.

**5. Interrogatory 10.**

As of January 1, for each year (during the relevant time period), please state with reference to the persons employed in each job category named in the preceding interrogatory:

- a. The total number of employees,
- b. The number of female employees,
- c. The number of employees over 40,
- d. The number of female employees over 40.

**6. Interrogatory 17.**

During all times relevant to the present complaint, identify and list for each GDB employee who has been promoted (promotee):

- a. name; gender; age; date of promotion;
- b. job promoted from, with its corresponding salary grade and department;
- c. job promoted into, with its corresponding job description and criteria, selection devices and procedures, salary grade and department;
- d. justifications and reasons why promotee was selected over others;
- e. date and position of initial hire, with its corresponding salary grade and department;
- f. other positions held with employer, with their corresponding salary grade and department;
- g. the supervisors and officials involved with promotion and the nature of their involvement;
- h. copy of personnel file and all documents related to promotion.

**7. Interrogatory 19.**

Has any EEOC claim ever been filed against defendant?

**8. Interrogatory 20.**

If your answer to the preceding interrogatory is in the affirmative, please state with reference to each claim filed against the defendant for the last ten (10) years:

- a. The name, address, sex, age, race, national origin, and religion of the person who filed the claim;
- b. The employment history with the defendant of the person who filed the claim, including job titles and dates;
- c. The date the claim was filed;
- d. A summary of the claim filed;
- e. A description of all action taken as a result of the claim filed.

**9. Interrogatory 24.**

Please identify each job vacancy which has occurred (during the relevant time period) in any facility owned or operated by the defendant and state:

- a. the date the job became available;
- b. the work experience, educational accreditation, or other qualifications required of job applicants;
- c. the name, sex, and age of the person who filled the vacancy.

**10. Request for Production of Documents 13.**

All documents, including but not limited to, e-mails, memorandums, and minutes, describing, relating, informing or referring to any staff meeting, client meetings, and/or seminars relating to job responsibilities and/or duties and/or clients of Plaintiff during the relevant time period.

**11. Request for Production of Documents 22.**

All personnel files for each employee who is or was in a similar job description, had similar or comparable duties, or received compensation comparable to that of the plaintiff at all times relevant to this complaint.

**12. Request for Production of Documents 24.**

All formal or informal complaints of both harassment and discrimination made against GDB, or against any of the codefendants, either in their personal capacity or as agents of GDB, noting:

- a. the nature of the complaint;
- b. the name of the complainant;
- c. the names of the alleged harassers or offenders;
- d. whether GDB conducted - and the nature of - any investigation; and
- e. disposition of the complaint.